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U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

December 22, 2021

**MEMO ENDORSED**

VIA ECF

Hon. Valerie E. Caproni  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: Zhao, et al. v. Mayorkas, et al., No. 21 Civ. 8323 (VEC)**

Dear Judge Caproni:

This Office represents the government in this action in which the plaintiffs seek an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate their Applications to Register Permanent Residence or to Adjust Status (Forms I-485). On behalf of the government, I write respectfully to request that the initial conference presently scheduled for January 7, 2022, be adjourned until on or after February 25, 2022.

The adjournment is respectfully requested because the plaintiff served this Office by mail on December 11, 2021, and thus the response to the complaint is not due until February 14, 2022. *See* Fed. R. Civ. P. 12(a)(2), 6(d). The government is still determining the status of the plaintiffs’ applications as well as the steps in the adjudicative process and the timing therefor. The parties thus respectfully submit that an adjournment until February 25, 2022 (*i.e.*, the Friday of the week following the current due date for the government’s response to the complaint) or thereafter would be in the interests of efficiency and conservation of judicial and party resources. This is the first request to adjourn the initial conference. The plaintiffs consent to this request.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Counsel of record (via ECF)

Application GRANTED.

The initial pretrial conference, currently scheduled for January 7, 2022 at 2:30 P.M., is adjourned to **February 25, 2022 at 10:30 A.M.** Pre-conference submissions are due no later than **Thursday, February 17, 2022.** For the conference dial in information and a description of the pre-conference submission requirements, the parties should consult the Court's order at docket entry 2.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

Date: December 23, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE